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January 22, 2024

Via CM/ECF

Hon. Elizabeth A. Pascal, U.S.M.J.
United States District Court – New Jersey
Mitchell H. Cohen Building and U.S. Courthouse
4 and Cooper Streets, Room 1050
Camden, NJ 08101

Re: *Lento, et al. v. Altman, et al.*
Case No. 1:22-cv-04840

Dear Judge Pascal:

Our firm represents Defendants in the above-entitled matter.

The parties held an initial meet and confer session on Friday, January 19, 2024. The parties were acting in a good faith effort to comply with your January 12, 2024, Order. During that initial conference, the parties agreed that we would request your guidance on the following issue:

The spreadsheet provided by Plaintiffs containing a list of clients that were refunded monies only listed the first name and last initial of the client. Unfortunately, this information was not sufficient for Defendants to compare it to our own records. The parties seek to have the full names listed with the assurance that none of the clients will be contacted concerning the subject spreadsheet or the subject litigation without prior approval of the Court. Additionally, should the document be used at trial or as an exhibit, it can be done under seal or the protective order already in place.

We appreciate your guidance on this issue.

Respectfully submitted,

/s/Keith Altman
Keith Altman, Esq.

/s/ Solomon M. Radner
Solomon M. Radner, Esq.

cc: All Counsel of Record (via CM/ECF)